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September 30, 2020

The Honorable William H. Pauley III
U.S. District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007
VIA ECF

Re: *United States v. Lazaro Rosbal Fleitas*, et. al, 19-cr-00631 (WHP)

Dear Judge Pauley,

I am CJA counsel to Lazaro Rosabal Fleitas in the above-captioned matter. His sentencing before Your Honor is currently scheduled for December 3, 2020.

I write now to respectfully request a modification of my client's current bail conditions. Your Honor previously granted my client's application to travel throughout the state of Florida for work. My client now has a new job opportunity that would involve him working for a delivery company called Fonseca Transportation. This company has a contract making deliveries for Amazon, and my client would be riding on a truck making deliveries in Texas, Louisiana, North Carolina, South Carolina, Florida and Virginia. We would respectfully request that the terms of his release be modified to allow him to travel to those locations as necessitated by this employment.

I have conferred with my counterparts at the government about this request and they have no objection. I have also conferred with the Pretrial officer supervising my client and he supports this application, so long as my client notifies the supervising officer of his work travel in advance.

Respectfully submitted,

Matthew J. Galluzzo

Matthew J. Galluzzo
Counsel for Lazaro Rosabal Fleitas

Cc:
AUSA Emily Johnson
AUSA Kiersten Fletcher

Application granted.

SO ORDERED:

A handwritten signature in blue ink, appearing to read 'William H. Pauley III'.
WILLIAM H. PAULEY III
U.S.D.J.

September 30, 2020